

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA, STATE
OF ILLINOIS and COOK COUNTY *ex rel.*
MATTHEW BLAUM,

Relator,

and HOT SHOTS NM, LLC,

Plaintiffs,

v.

TRIAD ISOTOPES, INC., COVIDIEN, INC.,
TODD GIBA, DONALD TREPASHKO, M.D.,
SAMI DISTRIBUTORS, INC., SARAH
SAMAI, and FAISEL SAMI,

Defendants.

Civil Case No. 1:11-cv-8098

Judge Robert M. Dow, Jr.

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a) and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3729 *et seq.*, and the Illinois False Claims Act, 740 ILCS 175/1 *et seq.*, Relator Matthew Blaum, Plaintiff Hot Shots NM, LLC, and Defendants Triad Isotopes, Inc., Covidien, Inc., Todd Giba, Donald Trepashko, and Sami Distributors, Inc. (collectively, the “Parties”) hereby stipulate to the entry of an order dismissing the above-captioned action with prejudice. This stipulation of dismissal with prejudice is made pursuant to a separate Settlement Agreement between Relator and

the Defendants. Relator has informed the United States and the State of Illinois of the settlement and this stipulation of dismissal, and Relator has been notified that neither the United States nor the State of Illinois objects to the dismissal. No party seeks from the Court an award of fees or costs.

A proposed order to this effect is being emailed to
Proposed_Order_Dow@ilndcourts.gov, per the Court's preferences.

Dated: November 27, 2017

Respectfully submitted,

Relator Matthew Blaum

By: /s/ Daniel M. Twetten
Daniel M. Twetten
Counsel for Relator

Hot Shots NM, LLC

By: /s/ Daniel M. Twetten
Daniel M. Twetten
Counsel for HotShots NM, LLC

Covidien, Inc.

By: /s/ Christopher J. Walsh
Christopher J. Walsh
Counsel for Covidien, Inc.

Sami Distributors, Inc.

By: /s/ Keevan D. Morgan
Keevan D. Morgan
Counsel for Sami Distributors, Inc.

Todd Giba

By: /s/ John Grady
John Grady
Counsel for Todd Giba

Donald Trepashko, M.D.

By: /s/ Cory D. Anderson
Cory D. Anderson
Counsel for Donald Trepashko, M.D.

Triad Isotopes, Inc.

By: /s/ Efrem M. Grail
Efrem M. Grail
Counsel for Triad Isotopes, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2017, a copy of the foregoing was served on all counsel of record via the Court's ECF system.

/s/ Daniel M. Twetten